



National Historic Preservation Act Compliance Strategy for Sustainable Army Ranges

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NHPA Compliance Strategy for Sustainable Army Ranges

Briefing Purpose

Provide information to DoD regarding the Army's NHPA Strategy for Sustainable Ranges including a "Program Comment" for Dudded Impact Areas



NHPA Compliance Strategy for Sustainable Army Ranges

Briefing Content

- **NHPA Strategy for Sustainable Ranges**
- **Issues**
- **Solutions**
- **Approach**
- **Time Frame**
- **Expected Results**
- **Points of Contact**



NHPA Compliance Strategy for Sustainable Army Ranges

NHPA Strategy for Sustainable Army Ranges

Two Part Strategy:

- 1. Streamline Installation NHPA Compliance**
Implement Army Alternate Procedures to support programmatic NHPA compliance for Maneuver Areas
- 2. Army-wide Programmatic Compliance Action** **Proposed NHPA “Program Comment” to support Live Fire Training and Testing and resulting effects to historic properties in duded Impact**



NHPA Compliance Strategy for Sustainable Army Ranges

NHPA Compliance Issues for Sustainable Ranges

Impact Areas: Existing Army NHPA agreements do not address effects of live fire training/testing on historic properties in duded Impact Areas. Effects of live fire training on historic properties in Impact Areas was a major factor in court decision causing Army to cease live fire training at Makua, HI.

Maneuver areas: Army Testimony at Encroachment Hearings identified the growing inventory of archeological sites as a significant encroachment issue for Army maneuver areas. (Fort Hood, TX)

Facts Bearing on the Archeological Site Encroachment Issue:



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Issues (cont.)

Facts Bearing on Archeological Site Encroachment Issue

Inventory Growth - Inventory of archeological sites in maneuver areas continues to increase by an average of 5,000 sites per year, 300,000 acres inventoried per year (64,000 total archeological sites on 4.2 million total inventoried Army acres).

DoD policy emphasis (DoDI 4715.3, D.3.a. / MoMs) - Policy emphasizes inventory to identify and protect sites without equivalent emphasis on evaluation for National Register eligibility, and mitigation of properties that impede mission.

Installation NHPA Compliance Strategies - Focused on inventory, project-by-project / site-by-site NHPA compliance, and protection / avoidance, rather than programmatic approach to compliance addressing categories of resources and activities.



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Solutions

Maneuver Areas - *Army Alternate Procedures*

Implementation is ongoing and provides for plan-based compliance focused on a more equal balance between mission requirements and historic properties. Addresses encroachment through emphasis on programmatic approach to inventory, evaluation of National Register eligible properties, and treatment of historic properties that significantly impede mission.

Impact Areas - *Program Comment*

Proposed Army-wide NHPA *Program Comment* for live fire training and testing and resulting effects to historic properties in duded Impact Areas. Dialogue initiated with ACHP indicates agreement with need for, and

support of Program Comment approach.



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Approach

Maneuver Areas

Army Alternate Procedures Implementation Status

- **Paradigm Shift from project-by-project, site-by-site compliance in 36 CFR 800 to programmatic compliance following an agreed upon plan**
- **FY02 Pilot Projects Underway - AAP Historic Property Plans undergoing stakeholder consultation for Fort Sam Houston, TX, and Fort Benning, GA**
- **FY03 Pilot Projects - US Army Garrison, AK; Fort Hood, TX; Fort Sill, OK**
- **Numerous other installations considering AAP adoption**
- **Army developing policy criteria to trigger AAP as a requirement for certain installations**



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Approach

Impact Areas

Army Program Comment Rationale:

It is not feasible from a financial, or health and safety standpoint to apply standard Section 106 measures to identify, evaluate, assess effects, and treat archeological sites and other historic properties located in duded Army Impact Areas.

Actual physical impacts to historic properties in duded Army Impact Areas are an “acceptable loss” considering the national importance of the military mission, the infeasibility of applying measures normally required under Section 106, and the magnitude of the Army’s on-going NHPA program.



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Army Program Comment Coordination

Meeting with Department of Air Force and Department of Navy Staff, 27 Nov 02

Meeting with HQ Marine Corps Staff, 12 Dec 02

Summary of Identified Issues

- Differing concept and uses of “Impact Areas” resulting from different weapons systems and training strategies
- Different policies and practices regarding historic properties in Impact Areas
- Lack of centralized data bases for proposed mitigation

Finding - Duplicated Impact Areas and NHPA compliance are an Army unique issue due to significant differences between service weapon systems, training strategies, and resulting abilities to meet requirements following the standard NHPA compliance procedures.

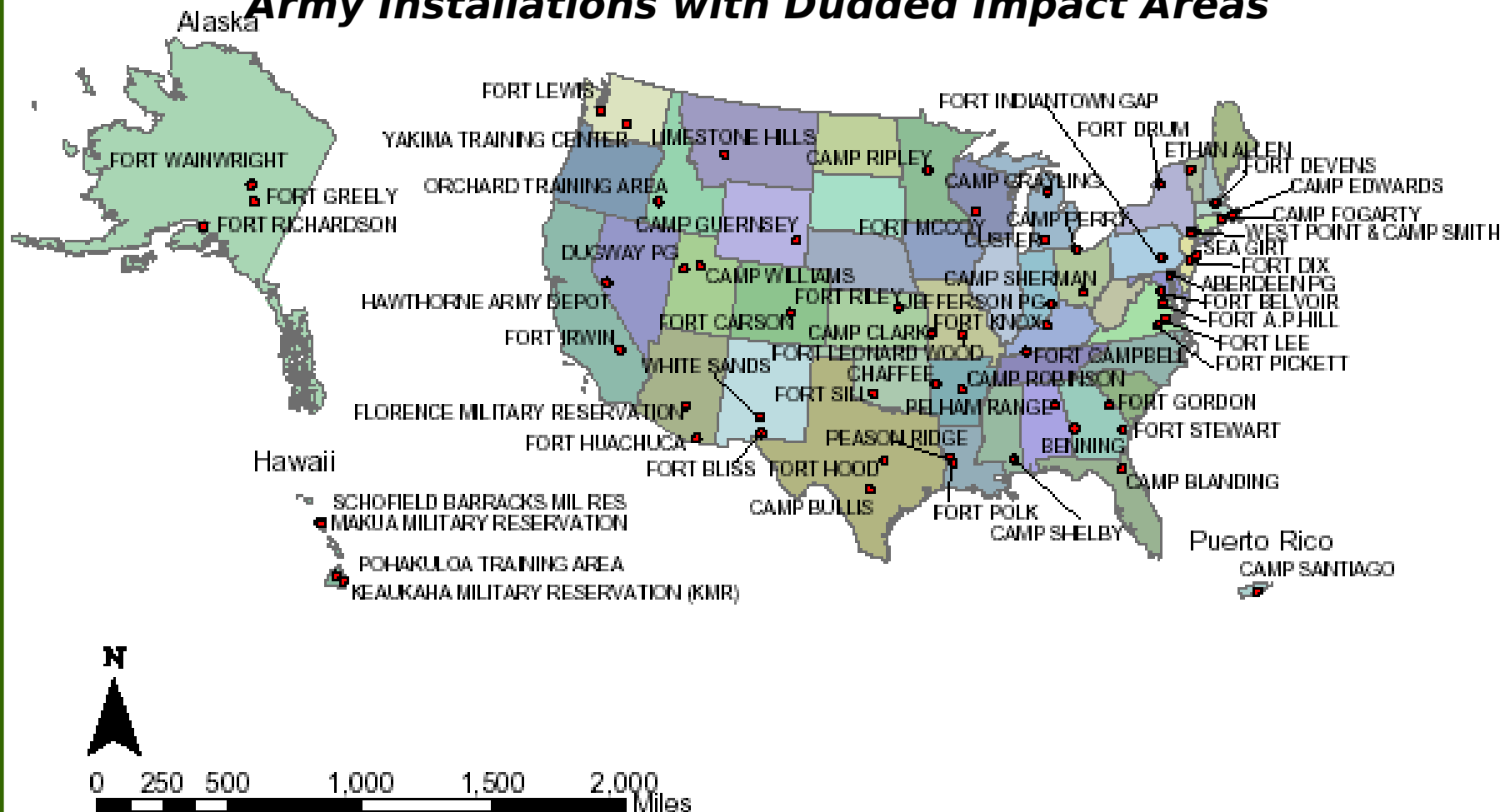


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Scope of Program Comment for Live Fire and Effects to Historic Properties in Impact Areas

- **66 active installations with duded impact areas**
- **166 duded impact areas on these 66 installations**
- **1,363,081 acres of duded impact area**
- **8.4% of total Army lands (16.7 million acres)**

Army Installations with Dudded Impact Areas



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23 January 2003



NHPA Compliance Strategy for Sustainable Army Ranges

Ar	Installation Name	Installation Acreage	Number of Dudded Impact Areas	Acres of Dudded Impact Areas	AS
	ABERDEEN PROVING GROUND (AA)	64250.35	3	50666.78	
	ARMY NATIONAL GUARD TS CAMP EDWARDS	13284.51	1	2210.93	
	BRAGG	143593.72	4	29990.04	
	CAMP ATTERBURY	31888.68	2	3542.84	
	CAMP BLANDING	68657.61	1	14603.29	
	CAMP BULLIS	27457.36	1	5566.32	
	CAMP CLARK	996.84	1	51.88	
	CAMP FOGARTY TRAINING SITE	17754.86	2	15.05	
	CAMP GRAYLING	144903.74	2	7961.16	
	CAMP GUERNSEY	35062.34	2	2580.18	
	CAMP PERRY	342.87	1	0.08	
	CAMP SANTIAGO	12043.92	1	1438.4	
	CAMP SHERMAN_NC	430.3	1	20.84	
	CHAFFEE	63519.3	1	6039.31	
	DUGWAY PROVING GROUND	763092.6	3	167000.68	
	ETHAN ALLEN FIRING RANGE	10742.29	2	575.71	
	FLORENCE TRAINING SITE	25558.71	1	3735.33	
	FORT A.P. HILL	75629.18	16	2208.93	
	FORT BELVOIR	2177.62	1	16.13	
	FORT BENNING	168788.11	8	16062.89	
	FORT BLISS	1096153.2	11	411957.31	
	FORT CAMPBELL	94347.96	4	22300.92	
	FORT CARSON	137462.85	1	15610.79	
	FORT CUSTER TRAINING CENTER	7486.73	1	2550	
	FORT DEVENS	4587.63	1	670.96	
	FORT DIX (USARC)	28001.48	1	2064.22	
	FORT DRUM	98524.4	1	20270.69	
	FORT INDIANTOWN GAP	14939.49	1	1327.87	
	FORT IRWIN	587508.42	7	129582.08	
	FORT JACKSON	29531.56	1	5458.72	
	FORT KNOX	101622.9	10	41314.89	
	FORT LEE	3454.16	1	1091.54	
	FORT LEONARD WOOD	53502.42	2	9121.68	
	FORT LEWIS	77577	1	1713.07	
	FORT MCCOY	135600.79	1	7272.79	



NHPA Compliance Strategy for Sustainable Army Ranges

Installation Name	Installation Acreage	Number of Dudded Impact Areas	Acres of Dudded Impact Areas
FORT PICKETT	38899.35	1	1504.82
FORT RILEY	92659.79	2	15182.75
FORT SILL	85002.17	3	34872.4
FORT STEWART	274136.82	1	12197.49
GORDON	49352.77	3	3886.84
GREELY	631643.1	4	63138
HAWTHORNE ARMY DEPOT	35789.13	2	4994.86
HENRY H COBB JR - PELHAM	22142.34	2	3740.77
HOOD	199758.4	2	14044.48
HUACHUCA	73952.82	1	6646.09
JEFFERSON PROVING GROUND	1050.24	2	1050.24
KEAUKAHA MILITARY RESERVATION (KMR)	434.37	1	55.72
LIMESTONE HILLS TRAINING AREA	19119.7	2	546.37
MAKUA MILITARY RESERVATION	4227.46	1	3435.56
MTA CAMP RIPLEY	50928.93	3	6177.67
MTA CAMP ROBINSON	30837.12	1	1252.41
MTA CAMP WILLIAMS	24999.52	4	6700.66
NGTC AT SEA GIRT	119.96	1	18.09
ORCHARD TRAINING AREA	138282.83	1	3333.93
PEASON RIDGE_NC	33455.9	3	5763.01
POHAKULOA TRAINING AREA	109950.42	1	45844.73
POLK	138737.35	10	11337.81
RICHARDSON	54541.18	1	2482.9
RUCKER	58244	1	3012.88
SCHOFIELD BARRACKS MIL RES	11441.48	1	4536.94
SHELBY	133793.02	1	4669
SMITH, NY	1762.69	2	229.88
WAINWRIGHT (YUKON)	922589.33	4	52040
WEST POINT MILITARY RESERVATION	14101.01	2	646.41
WHITE SANDS MISSILE RANGE	4567482.65	3	45302.98
YAKIMA TRAINING CENTER	324297.62	2	17840.6



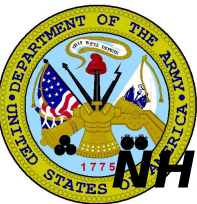
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Program Comment Proposed Mitigation

The Army's Ongoing NHPA Program is the Mitigation

Provide an Annual Report to ACHP detailing the Army NHPA compliance program using data from the Environmental Programs Report (EPR) and Environmental Quality Report (EQR). The Annual Report to ACHP would include:

- **Installation-by-Installation information from EPR to demonstrate *identification and programming* of resource requirements for NHPA compliance**
- **Installation-by-installation status report on annual activities from the EQR to demonstrate *implementation* of NHPA requirements**



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Program Comment Process

- **Army Secretariat notifies ACHP of intent to seek Program Comment**
- **Information meetings with NCSHPO, NATHPO, and NTHP**
- **Army initiates public participation requirement through NEPA process**
- **Army provides ACHP with formal request for Program Comment, a mitigation strategy, and a summary of public comments**
- **ACHP conducts consultation with stakeholders**
- **ACHP vote to issue Program Comment**
- **Army publishes notice in Federal Register**



NHPA Compliance Strategy for Sustainable Army Ranges

Schedule - One Year (estimated)

- **31 Jan 03 - Army notifies ACHP of intent to seek Program Comment**
- **Feb 03 - Information meetings with stakeholders**
- **Mar 03 - Army prepares NEPA document (Environmental Assessment)**
- **15 Apr 03 - Army distributes NEPA document for 30-day public review**
- **30 May 03 - NEPA comment period closes, consideration of comments**
- **30 Jun 03 - Army formally requests Program Comment from ACHP**
- **15 Jul - 15 Sep 03 - ACHP Comment period (45 day comment period may be extended upon ACHP request)**



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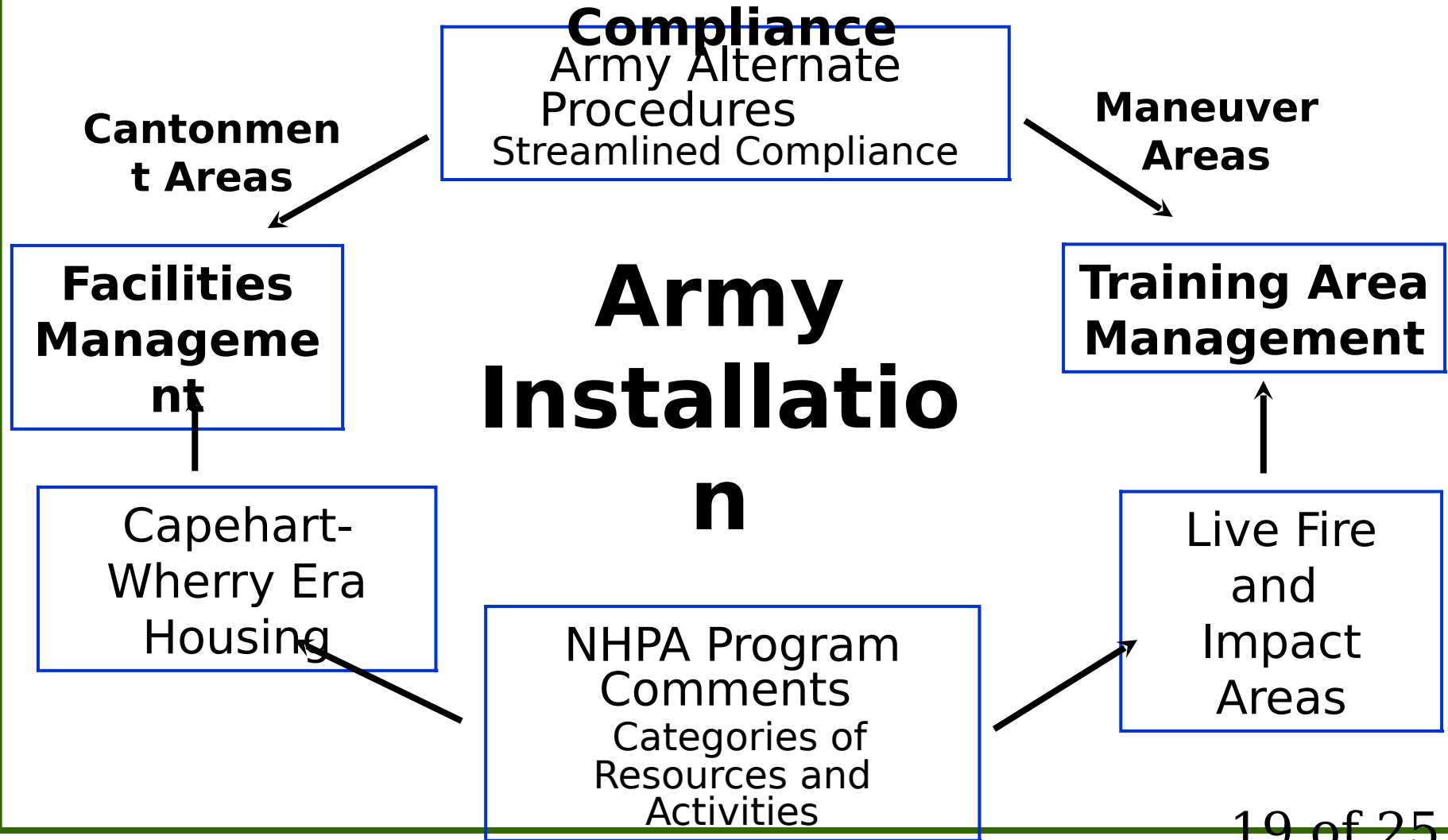
Expected Results of Program Comment for Impact Areas

- **A comprehensive NHPA Compliance Strategy for Army Range Sustainment.**
- **Provides installations with one-time, Army-wide NHPA compliance action that supports live fire training and testing.**
- **Eliminates a significant existing agency-wide legal exposure for live-fire training and testing in terms of NHPA compliance.**
- **Addresses an issue having DoD-wide implications considering the extent of use of Army impact areas by other services**
- **An important element in demonstrating a**



NHPA Compliance Strategy for Sustainable Army Ranges

Improved Army Business Practices for NHPA





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Points of Contact for Army Cultural Resources Program

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